IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

TRUTEK CORP., Plaintiff,

V.

BlueWillow Biologics, Inc.
ROBIN ROE 1 through 10, gender
neutral fictitious names, and ABC
CORPORATION 1 through 10
(fictitious names).

Defendants.

CIVIL ACTION No. 4:21-cv-10312

Hon. F. Kay Behm

DECLARATION OF STANLEY H. KREMEN IN SUPPORT OF PLAINTIFF'S MOTION TO EXCLUDE TESTIMONY OF MANSOOR M. AMIJI

- I, Stanley H. Kremen, being of full age, hereby depose and say:
- 1. I am a citizen of the United States.
- 2. I am an attorney licensed to practice in the State of California.
- 3. I am a patent attorney licensed to practice before the United States

 Patent and Trademark Office ("USPTO").

DECLARATION OF STANLEY H. KREMEN

- 4. I am admitted to and qualified as an attorney and counselor of the United States District Court of the Eastern District of Michigan.
- 5. I am an attorney of record in this instant lawsuit representing the Plaintiff, Trutek Corp., in this matter.
- 6. I met and conferred with Liane Peterson, Esq., who is an attorney of record in this instant lawsuit representing the Defendant, BlueWillow Biologics, Inc., in this matter.
- 7. I explained to her that Plaintiff will be filing a motion to exclude testimony of Defendant's expert, Mansoor M. Amiji, Ph.D., with respect to Defendant's claim that U.S. Patent No. 8,163,802 is invalid. She indicated that this motion will be opposed.
- I will be filing Plaintiff's Motion to Exclude Testimony of Mansoor
 M. Amiji today.
- 9. Attached to said motion as Exhibit A is a true copy of the USPTO Office Action dated August 25, 2011 for U.S. Patent Application No. 12/467,271, which was filed on May 16, 2009. This patent application was allowed by the USPTO to issue as U.S. Patent No. 8,163,802 B2 on April 24, 2012.
- 10. Attached to said motion is a true copy of U.S. Patent No. 8,163,802.

DECLARATION OF STANLEY H. KREMEN

11. Attached to said motion is a true copy of the deposition testimony of Dr. Mansoor M. Amiji taken on October 14, 2022 in this matter. Some text on pages 78-79 was redacted at defense counsel's request. The redacted text has no bearing on the issues before the Court regarding said motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on this 29th day of March, 2023.

Stanley H. Kremen

Stanley H. Kremen